

IAP17 Rec'd PCT/PTO 28 APR 2006

STATEMENT

The Examiner is respectfully thanked for the thoughtful consideration provided to this application. Reconsideration of this application is respectfully requested in light of the following statements.

Claims 1-36 are now pending in this application. Each of claims 1, 23, and 36 are in independent form.

Inventive Step

The Written Opinion contends that each of claims 1-36 lacks an inventive step under PCT Article 33(3) in light of Ainsbury (US Patent 6,078,924) combined with Young (US Patent 6,038,567). These contentions are respectfully traversed.

Independent Claims 1, 23 and 36

Each of independent claims 1, 23, and 36 recites the common limitation of “automatically and individually controlling” or “control” “a content, a plurality of content attributes, a usage permission, **and** a distribution permission of each of a plurality of objects in each of multiple documents derived from the source document”.

As acknowledged in the Written Opinion, Ainsbury does “not explicitly teach individual content control”. Instead, rather than “controlling” “content”, “the invention” of Ainsbury allegedly “relates to information management and navigation. More particularly, the invention relates to an information platform that collects and integrates data, observations, and intelligence; provides controls for multiple methods of information navigation and analysis; and allows details to be digested in the context of other data, regardless of its type.” See Ainsbury col. 1, lines 8-15.

Moreover, Ainsbury does not expressly or inherently teach, suggest, or lead directly to:

“automatically and individually controlling... each of a plurality of objects in each of multiple documents derived from the source document”;

“automatically and individually controlling... a usage permission... of each of a plurality of objects in each of multiple documents derived from the source document”;

or

“automatically and individually controlling... a distribution permission of each of a plurality of objects in each of multiple documents derived from the source document”.

Likewise, Young does not expressly or inherently teach, suggest, or lead directly to:

“automatically and individually controlling... each of a plurality of objects in each of multiple documents derived from the source document”;

“automatically and individually controlling... a usage permission... of each of a plurality of objects in each of multiple documents derived from the source document”;

or

“automatically and individually controlling... a distribution permission of each of a plurality of objects in each of multiple documents derived from the source document”.

Instead, Young allegedly discloses a “desktop publishing software program configured to propagate object content-defining and format-defining object properties so that user-defined object properties automatically propagate to **other objects in the document.**”

Thus, even if there were motivation or suggestion to modify or combine the cited references (an assumption with which the applicant disagrees), and even if there were a reasonable expectation of success in combining or modifying the cited references (another assumption with which the applicant disagrees), the cited references still do not expressly or inherently teach or suggest every limitation of the independent claims, and consequently fail to establish a *prima facie* case of lack of inventive step.

Consequently, Applicant respectfully submits that each of independent claims 1, 23, and 36, and all dependent claims ultimately depending therefrom, meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 2 and 24

Dependent claim 2 recites that “said document management module is further adapted to

define a content, a plurality of content attributes, a usage permission, and a distribution permission of each of the plurality of objects of the source document”, and dependent claim 24 recites “defining a content, a plurality of content attributes, a usage permission, and a distribution permission of each of the plurality of objects of the source document”.

Neither **Ainsbury nor Young** expressly or inherently teach, suggest, or lead directly to:

“defining a content, a plurality of content attributes, a usage permission, **and** a distribution permission of each of the plurality of objects of the source document”;

“defining ... **a usage permission...** of **each** of the plurality of objects of the source document”; or

“defining ... **a distribution permission of each** of the plurality of objects of the source document”.

Consequently, Applicant respectfully submits that each of claims 2 and 24 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 3 and 25

Dependent claim 3 recites that “said document management module is further adapted to prevent modification of a content, a plurality of content attributes, a usage permission, and a distribution permission of each of the plurality of objects of the source document”, and dependent claim 25 recites “preventing modification of a content, a plurality of content attributes, a usage permission, and a distribution permission of each of the plurality of objects of the source document”.

Neither **Ainsbury nor Young** expressly or inherently teach, suggest, or lead directly to:

“**preventing modification of** a content, a plurality of content attributes, a usage permission, **and** a distribution permission of each of the plurality of objects of the source document”;

“**preventing modification of ... a usage permission...** of **each** of the plurality of objects of the source document”; or

“**preventing modification of ... a distribution permission of each** of the plurality of objects of the source document”.

Consequently, Applicant respectfully submits that each of claims 3 and 25 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 4 and 26

Dependent claim 4 recites that “said document management module is further adapted to publish the source document”, and dependent claim 26 recites “publishing the source document”.

As found on page 7, paragraph 48 of the application, Applicant has defined a specific meaning for the word “publish”, namely “with respect to a document (i.e., a Version), a user taking an action using the application to ‘lock in’ and/or ‘set’ all attributes of a document (Version) and the Objects within the document such that the attributes may not be modified by a subsequent user of the document”.

Neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to: “**publishing**” or “publish” “the source document”, using the definition for “publish” provided by Applicant.

Consequently, Applicant respectfully submits that each of claims 4 and 26 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 8 and 30

Dependent claim 8 recites that “said document management module is further adapted to prevent modification of the content, plurality of content attributes, usage permission, and distribution permission in each of the multiple documents derived from the source document”.

Dependent claim 30 recites “preventing modification of the content, plurality of content attributes, usage permission, and distribution permission in each of the multiple documents derived from the source document”.

Neither **Ainsbury nor Young** expressly or inherently teach, suggest, or lead directly to: “**preventing modification** of the content, plurality of content attributes, usage permission, **and distribution permission in each** of the multiple documents derived from the source document”;

“**preventing modification of ...a usage permission...** in each of the multiple documents

derived from the source document”; or

“**preventing modification of ... a distribution permission** in each of the multiple documents derived from the source document”.

Consequently, Applicant respectfully submits that each of claims 8 and 30 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 9 and 31

Dependent claim 9 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that “said document management module is further adapted to determine an identity of the source document from each of the multiple documents derived from the source document”. Dependent claim 31 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, “determining an identity of the source document from each of the multiple documents derived from the source document”.

Consequently, Applicant respectfully submits that each of claims 9 and 31 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 10 and 32

Dependent claim 10 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that “said document management module is further adapted to perform a **bi-directional comparison** of the source document and a derivative document derived from the source document.” Dependent claim 32 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, “performing a **bi-directional comparison** of the source document and a derivative document derived from the source document.”

Consequently, Applicant respectfully submits that each of claims 10 and 32 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claims 11

Dependent claim 11 recites, yet neither Ainsbury nor Young expressly or inherently

teach, suggest, or lead directly to, that “said document management module is further adapted to perform a **bi-directional comparison** of a **first derivative document** derived from the source document **and a second derivative document** derived from the source document”.

Consequently, Applicant respectfully submits that each of claims 11 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 12

Dependent claim 12 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that “said document management module is further adapted to language-independently search the database”. Consequently, Applicant respectfully submits that claim 12 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 13 and 34

Dependent claim 13 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that “said document management module is further adapted to generate an auxiliary document from the source document, the auxiliary document reflecting at least a portion of a structure of the source document, **at least a portion of a content of the auxiliary document differing from a content of the source document**”. Dependent claim 34 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, “generating an auxiliary document from the source document, the auxiliary document reflecting at least a portion of a structure of the source document, **at least a portion of a content of the auxiliary document differing from a content of the source document**”. Consequently, Applicant respectfully submits that claim 13 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 17

Dependent claim 17 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that “wherein the plurality of content attributes comprises

document structure information". Consequently, Applicant respectfully submits that claim 17 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 18

Dependent claim 18 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that "wherein the plurality of content attributes comprises **content creator information**". Consequently, Applicant respectfully submits that claim 18 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 21

Dependent claim 21 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that "wherein the plurality of objects comprises an **audio** object". Consequently, Applicant respectfully submits that claim 21 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.

Claim 22

Dependent claim 22 recites, yet neither Ainsbury nor Young expressly or inherently teach, suggest, or lead directly to, that "wherein the plurality of objects comprises a **video** object". Consequently, Applicant respectfully submits that claim 22 meets the requirements of Article 33(3) PCT, and Applicant respectfully requests notification thereof.